

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

| | | |
|---------------------------|---|----------------------------|
| BETHEL MINISTRIES, INC., |) | |
| |) | |
| |) | |
| <i>Plaintiff,</i> |) | |
| v. |) | Case No. 1:19-cv-01853-SAG |
| |) | |
| MOHAMMED CHOUDURY, et al. |) | |
| |) | |
| |) | |
| <i>Defendants.</i> |) | |

PLAINTIFF'S UPDATED EXHIBIT LIST

EXHIBIT NO.

1. Transcript of Deposition of Claire Dant
2. Transcript of Deposition of Patricia Wecker
3. Plaintiff's First Amended Answers to Defendants' First Set of Interrogatories
4. 2018 Budget Bill, Chapter 150
5. Transcript of Deposition of Monica Kearns
6. Transcript of Deposition of James Klarman
7. Fiscal Years 2017–2020 Budget Bill Nondiscrimination Requirements
8. Gallagher statement on conflicting religious freedom and nondiscrimination requirements
9. Transcript of Deposition of Linda Eberhart
10. Transcript of Deposition of Beth Harbinson
11. Defendants' Responses to Plaintiff's First Set of Requests for Admission
12. Gunning email confirming no evidence of discriminatory behavior

EXHIBIT NO.

13. Emails between Posey-Moss and Kearns regarding Trinity Lutheran Christian School
14. Maryland PTA Statement to BOOST Advisory Board
15. Maryland PTA 2016 Legislative Agenda
16. Trinity Lutheran Christian School Handbook Excerpt
17. October 11, 2017 BOOST Advisory Board Meeting Minutes
18. Letters to Trinity Lutheran Christian School and Parents regarding expulsion from BOOST program
19. Transcript of Deposition of Felicia Wise
20. November 2017 Email from Kearns to Gallagher regarding start of handbook review
21. Emails between Dant and Gunning regarding sample revised handbook language
22. Transcript of Deposition of Matthew Gallagher
23. MSDE Letters to schools regarding handbook language
24. List of Category 3 schools under review as of April 2018
25. Examples of revised handbook language
26. April 2018 emails between Kearns and Gallagher regarding Category 3 schools
27. Transcript of Deposition of Elizabeth Green
28. Transcript of Deposition of A. Skipp Sanders
29. January 2018 Office of the Attorney General Memo
30. Kearns email regarding Category 3 schools and the addition of Broadfording Christian Academy
31. List of Category 3 schools as of March 2018
32. Klarman email to school forwarding January 2018 OAG Memo

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- 33. Kearns email to school forwarding January 2018 OAG Memo
- 34. Bethel Christian Academy 2017–18 Handbook
- 35. March 13, 2018 Letter from Dant to Kearns
- 36. Carpenter email summarizing Bethel and Woodstream decision timeline
- 37. Kearns email directing staff to keep May 1, 2018 OAG Memo confidential
- 38. Transcript of May 3, 2018 BOOST Advisory Board Meeting
- 39. Transcript of Deposition of Marva Jo Camp
- 40. May 25, 2018 Letter from Kearns to Dant
- 41. May 29, 2018 Letter from Dant to Kearns
- 42. June 21, 2018 BOOST Advisory Board Meeting Summary of Decisions
- 43. Transcript of June 21, 2018 BOOST Advisory Meeting
- 44. Letter to Bethel regarding expulsion from BOOST program
- 45. Letter to Bethel regarding clawback of BOOST scholarships
- 46. Letter to Bethel regarding handbook revisions and repayment options
- 47. Gallagher email discussing conversations with Baltimore Sun reporter
- 48. Eberhart email to Gallagher regarding editorial
- 49. Transcript of Deposition of Nancy Grasmick
- 50. Transcript of Deposition of Donna Gunning
- 51. Plaintiff's Amended Notice of Rule 30(b)(6) Deposition
- 52. Email inquiry regarding meaning of nondiscrimination language

EXHIBIT NO.

- 53. Bnos Yisroel email advising signing assurances with reservations
- 54. Klarman email stating Bethel's handbook was the only questionable one received
- 55. Flagged statements in Bethel's handbook
- 56. April 24, 2020 Letter from Gunning to Dant denying Bethel's application to the Aid for Nonpublic Schools program
- 57. Talmudical Academy of Baltimore School Conduct Policy and Behavioral Standards
- 58. 2017–2018 BOOST Scholarship Award Summary
- 59. 2018–2019 BOOST Scholarship Award Summary
- 60. Gallagher Tweet
- 61. Student Handbook of Yeshiva of Greater Washington
- 62. Bais HeMedrash & Mesivta of Baltimore Academic Catalog
- 63. Klarman email to Dant regarding BOOST review of handbook
- 64. Email to parent regarding ineligibility of chosen school to participate in BOOST
- 65. Krieger Schechter Day School Handbook
- 66. Supplemental Production Letter and Documents
- 67. School Handbook Excerpts